

# EXHIBIT 17

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

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STATE OF TEXAS;

*Plaintiffs,*

vs.

UNITED STATES OF AMERICA, ET AL.;

*Defendants,*

*and*

KARLA PEREZ, ET AL.;

STATE OF NEW JERSEY,

*Defendant-Intervenors.*

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Case No. 1:18-cv-00068

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**PLAINTIFF STATES' EXPERT WITNESS DESIGNATIONS**

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**TO:** Federal Defendants, by and through their attorney of record Jeffrey S. Robins, U.S. Department of Justice, Civil Division, Office of Immigration Litigation, District Court Section, P. O. Box 868, Washington, DC 20044;

Defendant-Intervenors Karla Perez, et al., by and through their attorney of record, Nina Perales, Mexican American Legal Defense and Educational Fund, 110 Broadway, Suite 300, San Antonio, Texas 78205; and

Defendant-Intervenor the State of New Jersey, by and through its attorney of record, Glenn Moramarco, New Jersey Attorney General's Office, Division of Law, Richard J. Hughes Justice Complex, 25 Market Street, 8th Floor, Trenton, New Jersey 08625-0116

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and the Court's Modified Rule 16 Scheduling Order (ECF No. 367), Plaintiffs, States of Texas, et al., designate the following individuals as expert witnesses:

Donald Deere, Ph.D.  
Senior Economist  
Welch Consulting  
1716 Briarcrest Drive, Suite 700  
Bryan, Texas 77802

Dr. Deere's written report containing the information required by Rule 26(a)(2)(B) has previously been filed with the Court and is incorporated herein by reference. See ECF No. 358.21, App. 438-53.

Lloyd B. Potter, Ph.D.  
Professor and Director  
Department of Demography and Institute for Demographic and Socioeconomic Research  
University of Texas at San Antonio  
501 W. Cesar Chavez Blvd.  
Monterey Building, 4th Floor  
San Antonio, Texas 78207-4415

Dr. Potter's written report containing the information required by Rule 26(a)(2)(B) has previously been filed with the Court and is incorporated herein by reference. See ECF No. 358.31, App. 623-39.

Plaintiffs reserve the right to rely on opinions from experts disclosed by other parties and to supplement these designations in response to other parties' disclosures.

March 19, 2019

Respectfully submitted.

STEVE MARSHALL  
Attorney General of Alabama

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Attorney General of Texas

LESLIE RUTLEDGE  
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/s/ Todd Lawrence Disher  
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ADAM ARTHUR BIGGS  
Assistant Attorney General

**COUNSEL FOR PLAINTIFF STATES**

**CERTIFICATE OF SERVICE**

I certify that on March 19, 2019, this document was served via electronic mail on all counsel of record.

/s/ Todd Lawrence Disher  
TODD LAWRENCE DISHER  
Trial Counsel for Civil Litigation

**COUNSEL FOR PLAINTIFF STATES**